

Alan Lescht & Associates, P.C.
1050 17th Street, NW, Suite 400
Washington, D.C. 20036
T: 202.463.6036
F: 202.463.6067

April 1, 2015

Via Electronic Case Filing & Electronic Mail

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: Celaj v. Gjonbalaj, Marolda, et al, Case No.: 13 Civ. 8504

This firm is Counsel to Plaintiff in the above-referenced matter. We write in response Defendants' Counsel letter dated April 1, 2015. Counsel's statement to this Court that Defendants have not received a copy of Plaintiff's portion of the Pretrial Order is incorrect. I emailed Counsel a copy of Plaintiff's portion of the Proposed Pretrial Order at 11:40 p.m. on March 31, 2015.¹

Moreover, although Your Honor's December 30, 2014 Scheduling Order² directed the parties to exchange drafts of their portions of the Joint Pretrial Order, Defendants' Counsel has failed to provide Plaintiff with Defendants' portion. When the Parties were to exchange drafts on Monday, March 31, 2015, Counsel unilaterally stated that Defendants would send their portion the following day³. As noted, Plaintiff has yet to see Defendants' draft.

Plaintiff Celaj has been largely unemployed from the time that Defendants terminated him on June 12, 2013. He will be prejudiced by any continued delay of the proceedings in this matter.

Counsel remains available should you have any questions in connection with this submission.

Respectfully Submitted,

/s/
Anabia Hasan, Esq.

¹ Attached hereto as Exhibit A, is an email containing Plaintiff's portion of Joint Pretrial Order served upon Defendants.

² A copy of your honor's Order is attached hereto as Exhibit B.

³ Attached hereto as Exhibit C is a March 30 2015 to March 31, 2015 e-mail chain between attorneys Swetnick and Chinitz.

cc Counsel of Record